

UNITED STATES OF AMERICA
POSTAL REGULATORY COMMISSION
WASHINGTON, DC 20268-0001

Competitive Product Prices
Global Plus 6 Contracts (MC2019-65)
Negotiated Service Agreement

Docket No.CP2019-70

PUBLIC REPRESENTATIVE COMMENTS ON
POSTAL SERVICE NOTICE OF MODIFICATION TWO TO A GLOBAL PLUS 6
NEGOTIATED SERVICE AGREEMENT

(January 28, 2020)

I. Introduction

The Public Representative hereby provides comments pursuant to a Commission Notice.¹ In that Notice, the Commission invited comments from interested persons, including the undersigned Public Representative, on the Postal Service's notice of Modification Two to a Global Plus 6 Negotiated Service Agreement.²

The Modification Two revises Articles 1, 3, 7, 8, 12, 13, 18, and 34 of the agreement that is the subject of this docket, adds Annexes 8 through 12 to the agreement, and extends the agreement to June 30, 2020. PS Notice at 1.

II. Comments

Pursuant to 39 U.S.C. § 3633(a), the Postal Service's competitive prices must not result in the subsidization of competitive products by market dominant products; must ensure that each competitive product covers its attributable costs; and, must

¹ PRC Notice Initiating Docket(s) for Recent Postal Service Negotiated Service Agreement Filings, January 17, 2020. (Notice).

² Notice of the United States Postal Service of Filing Modification Two to a Global Plus 6 Negotiated Service Agreement CP2019-70, January 16, 2020 (PS Notice).

ensure that all competitive products collectively contribute an appropriate share of the institutional costs of the Postal Service.

The Public Representative has reviewed Modification Two, and the supporting financial documentation for the contract filed under seal. Based upon that review, the Public Representative finds that Modification Two should allow the agreement to cover its attributable cost, will not cause cost coverage for the product to fall below 100 percent, and therefore complies with the requirements of 39 U.S.C. § 3633(a). The Public Representative supports approval of Modification Two.

The Public Representative respectfully submits the foregoing comments for the Commission's consideration.

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